United States of America
District of Massachusetts

Suffolk, ss.

United States

v.

Dean Tran

23-CR-10299-FDS

Motion to Extend Reporting Date

Now comes the Defendant, Dean Tran, who moves to extend his reporting date by 30 days. Mr. Tran needs additional time to engage appellate counsel, assist in his defense, and put his affairs into order.[1]

Mr. Tran is in the process of engaging appellate counsel for this case. Atty John Calcagni of Providence, Rhode Island is currently preparing to take this case on appeal and perhaps, or alternatively, the second federal case Mr. Tran is currently facing. He has indicated that he needs some additional time with Mr. Tran nearby to plan his defense strategy.

Mr. Tran is currently scheduled for trial on his second federal matter in July. He has just been scheduled for trial on the outstanding indictment in Worcester Superior Court for the middle of June.[2] Nonetheless, with 4 cases, Mr. Tran's legal defense is complicated and requires coordination amongst several attorneys. A 30 day delay in reporting will allow his to make all important decisions before he is incarcerated. It will also allow him to put his household affairs in order. A delay in the reporting date is in the interest of justice, if for no other reason than in-

[1] Mr. Tran will, separately, present a motion to stay his sentence pending appeal. That motion is considerably more involved where the Defendant needs to make a showing on four elements. It appears that the granting of a motion to stay sentence is a

[2] Mr. Tran's Suffolk Superior Indictment is presently in a holding pattern pending his interlocutory appeal to the SJC on legislative immunity grounds. The blue brief has been filed but the Attorney General's Office needs some additional time to file their brief. It is likely that oral argument will be held before the end of the term.

person coordination when first retaining a new attorney is important in planning and conducting a defense. Attorney Calcagni will be able to use the time to get up to speed on the intricacies of Mr. Tran's case, interview him extensively, and prepare to mount his defense.

Wherefore, the Defendant requests a 30 day extension of his reporting deadline.

Respectfully Submitted,
Dean Tran
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Certificate of Service

I, Michael Walsh, hereby certify that a copy of this motion was served upon AUSA John Mulcahy through the Court's online electronic docketing ECF/CM System on this 10th day of March 2025.

/S/ Michael Walsh